

*Re: Docket Number 98 N-1038 "Irradiation in the  
Production, Processing and Handling of Food"*

The Atlantic Chapter (New York State chapter) of the Sierra Club joins the overwhelming majority of people who want irradiated foods to be labeled. According to a poll conducted by the American Association of Retired Persons and the Center for Science in the Public Interest in April 1999, 88.6 percent of American consumers support labeling of irradiated foods. Seventy seven percent of the public would not eat irradiated food according to a 1997 CBS News poll, which is the very reason that the nuclear industry, food processors and agribusiness want labeling eliminated. JUL 27 A10 :20

Irradiated food must continue to be labeled with the radura (the international symbol for irradiated food) and a statement indicating that the food was treated with irradiation. This information must be clearly visible on the package or in the case of unpackaged food (e.g. unpackaged cabbages or oranges) on a nearby sign.

The fact that the great majority want irradiated food to be labeled should, in a democracy, be reason enough to continue labeling. Labeling of irradiated food protects the ability of consumers to choose what they buy and feed their families

There are other compelling reasons to continue labeling. Most fruits and vegetables that are irradiated have nutrient losses which are not obvious and are not expected by the consumer. Vitamins A, C, B, E and K are reduced. Losses of 20 to 80 percent are common.

Irradiation causes chemical changes that are not evident and are potentially hazardous. For example, irradiated meat may have high levels of benzene, a known carcinogen.

All irradiated foods contain unique radiolytic products that have never been adequately tested. Elimination of labeling will eliminate freedom to choose and will turn us all into guinea pigs in an uncontrolled experiment.

Sure, radiation can kill a wide range of pathogens in animal products. However it doesn't get to the roots of the problem, which are miserable, unsanitary living conditions and filthy industrial slaughterhouses, where the large number of animals slaughtered in a very short period of time makes it impossible to keep fecal material out of meat products. The three corporations that control more than 80 percent of the beef market have all been involved in scandals having to do with contaminated food. All three say they will irradiate their products. This strongly suggests that they will use irradiation to mask dirty meat rather than clean up their act.

If labeling is eliminated, more food will be irradiated, more irradiation facilities will be built and more environmental contamination, more worker exposure and more accidents will result, accidents such as the one in Georgia where Cesium-137 leaked into the water storage pool and it took the DOE \$47 million and 4 years to clean it up, or the 32 worker safety violations at Radiation Technology Inc. in New Jersey, including one in which a worker almost lost his life.

Betty Quick, Spokesperson for the Atlantic Chapter of the Sierra Club.  
P.O. Box 608, New Milford, NY 10959

*Betty Quick*

*C4536*



William Hubbard  
Docket Management Branch (HFA-305)  
FDA  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852